Attorney Docket No. CR9-98-062 # 19
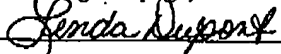LDS
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Date: *Nov. 1, 2002*

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Linda Dupont
Linda Dupont

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re application of: Knowles, N.

Serial No.: 09/105,528

Filed: June 26, 1998

For: Technique for Navigating Components of a Model Having Complex Relationships

Date: Nov. 1, 2002

Group No.: 2171

Examiner: Le, Uyen T.

Official

To Commissioner of Patents and Trademarks
Washington, DC 20231

TRANSMITTAL OF APPEAL BRIEF
(PATENT APPLICATION-37 CFR 192)

Sir:

Transmitted herewith in triplicate is the APPEAL BRIEF in this application with respect to the Notice of Appeal filed on August 1, 2002.

2. STATUS OF APPLICATION

This application is on behalf of

_X__   other than a small entity

____   small entity
       verified statement: ___ attached ___ already filed

3. FEE FOR FILING APPEAL BRIEF

Pursuant to 37 CFR 1.17(f) the fee for filing the Appeal Brief is:

____ Small entity $160.00

_X__ Other than a small entity $320.00

Appeal Brief fee due ___$320.00_____

110.00 CH   01 FC:1251
11/08/2002 LJOHNSON 0000003 090461 09105528

350.00 CH   01 FC:1402
11/08/2002 LJOHNSON 0000002 090461 09105528

<div align="right">Attorney Docket No. CR9-98-062</div>

4. EXTENSION OF TERM

The proceedings herein are for a patent application and the provisions of 37 CFR 1.136 apply.

(a)   Application petitions for an extension of time under 37 CFR 1.136 (fees: 37 CFR 1.17(a)-(d)) for the total number of months checked below:

Extension (months)	Fee for other than a small entity
___ one month	$ 110.00
___ two months	$ 400.00
___ three months	$ 920.00
___ four months	$1440.00

(b)   Applicant believes that no extension of term is required. However, this conditional petition is being made to provide for the possibility that applicant has inadvertently overlooked the need for a petition and fee for extension of time.

5. TOTAL FEE DUE

The total fee due is:

Appeal brief fee _____ 320.00 _____
Extension fee (if any) _____

TOTAL FEE DUE _____ $320.00 _____

6. FEE PAYMENT

___ Attached is a check in the sum of $ _____
_X_ Charge Account No. 09-0461 the sum of $320.00 _____
(a duplicate of this transmittal is attached)

7. FEE DEFICIENCY

_X_   If any additional extension and/or fee is required, this is a request therefor and to charge Account No. 09-0461.

_X_   If any additional fee for claims is required, charge Account No. 09-0461.

Signature of Attorney

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#19

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re application of	:	November 1, 2002
N. Knowles	:	IBM Corporation
Ser. No. 09/105,528	:	Dept.T81/Bldg. 503
Filed 06/26/98	:	P.O. Box 12195
For: Technique for Navigating Components	:	Res. Tri. Park, NC 27709
of a Model Having Complex Relationships	:	Art Unit: 2171
	:	Examiner: Uyen T. Le

APPEAL BRIEF

Assistant Commissioner for Patents
Washington, DC 20231

Sir:

The following remarks in the Appeal for the above identified Application are respectfully submitted:

REAL PARTY IN INTEREST

This Application has been assigned to the International Business Machines Corporation.

RELATED APPEALS AND INTERFERENCES

Applicants know of no other Appeals or Interferences which will directly affect or be directly affected by or having a bearing on the Boards decision in the pending Appeal.

STATUS OF CLAIMS

The Application was originally filed with Claims 1 - 20. Claims 1, 3, 8, 10, 15 and 17 were amended and Claims 2, 9 and 16 canceled in the Amendment dated July 24, 2000. Claims 1, 8 and 15 were again amended in the Amendment dated March 26, 2001. No further amendment to the claims was made. Accordingly, Claims 1, 3 - 8, 10 - 15, and 17 - 20 remain pending, and these are the claims which are the subject of this Appeal. A copy of the appealed claims, Claims 1, 3 - 8, 10 - 15, and 17 - 20, are contained in the attached Appendix.

STATUS OF AMENDMENTS

Applicants last filed a Response on March 5, 2002, which was entered (but contained no amendments). No further amendments were made to the Application.

SUMMARY OF THE INVENTION

The present invention discloses a technique for displaying and editing components of data which may have complex many-to-many (i.e., non-hierarchical) relationships, using a program such as a browser. The components are the elements of an object model, wherein the elements represent the object model. The components are presented in such a way as to make the **relationships** explicitly visible, allowing a user to navigate the **relationships** in an efficient, intuitive manner that clearly aligns with the structure of the underlying object model. In a preferred embodiment, when the

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user **selects** one of the explicit relationships, he is presented with a list of actions tailored to that relationship. In a further enhancement, the user may define one or more filters that will be applied to the actions list before it is presented.

STATEMENT OF ISSUES PRESENTED

Applicants present for review the final rejection of Claims 1, 7, 8, 14 and 15 under 35 U.S.C. 102(e) as being anticipated by U.S. Patent No. 5,903,478 to Fintel et al (Fintel) and of Claims 3-6, 10-13 and 17-20 as being unpatentable over Fintel in view of "applicant's admitted prior art (AAPA) at pages 3-5, 25".

GROUPING OF THE CLAIMS

Independent Claims 1, 8 and 15 stand or fall together.

Dependent Claims 3, 10 and 17 stand or fall together.

Dependent Claims 4, 11 and 18 stand or fall together.

Dependent Claims 6, 13 and 20 stands or falls together.

Dependent Claims 5, 12 and 19 stand or fall with Claims 3, 10 and 17.

Dependent Claims 7 and 14 stand or fall with Claims 1 and 8.

ARGUMENT

Applicant traverses the rejections below.

A. Differences Between the Claimed Invention and the Cited Art

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1.   Independent Claims 1, 8 and 15

Independent Claims 1, 8 and 15 stand or fall together. For exemplary purposes.
Claim 1 will now be discessed relative to the cited art. Claim 1 was rejected under 35
USC Section 102(e) as being anticipated by Fintel.

Independent Claim 1 recites "a subprocess for retrieving and displaying
relationship information from said model when said selected element is a component of
said model". Relative to this subject matter, Figure 181 and then Figures 175 through
201 of Fintel were originally cited in the Office Action mailed on December 5, 2001.
However, Applicants are unable to find this subject matter in this these figures. Figure
181 is described as illustrating "a process of establishing relationships between the
objects that will be included in the symbol-based decision rationale table." This does
not teach, suggest or disclose "retrieving and displaying relationship information..." No
relationship information is retrieved based on selection of an element from a model; no
retrieved relationship information is then displayed. That Office Action contained the
conclusory statement with respect to the subject matter that "[c]learly, in order to edit
relationships, all the claimed sub routines have to be present in the system taught by
Fintel." No further explanation was given. In essence, the 102 rejection was based on
an argument that the cited subject matter was inherent in Fintel, even though it was not
discussed. This cannot sustain a rejection under Section 102.

In the Office Action of December 5, 2001, numbered paragraph 1 claims that
"elements of the model shown in Figure 181 are related to one another since they form
a decision matrix." In Fintel, Figures 175-181 are described as illustrating "a process of
establishing relationships; between the objects that will be included in the symbol-based
decision rationale table" (column 5, lines 7-9). Later, column 43 lines 57-60 states that
Fig. 181 shows "a display on a computer screen illustrating two dimensional table
18102" and that the "location dimension includes three location related objects." There

is no discussion or description of an object model or the selection of an element that is a component of the object model or that any selection causes relationship information to be retrieved and displayed. Numbered paragraph 1 goes on to say that a user may edit relationships as illustrated in Figure 182. In column 44, the description of Fig. 182 states that a visual interface is invoked by selecting and activating an intersection. There is no discussion that the intersection is a component of an object model. There is no discussion that this causes relationship information to be displayed. Certainly, a menu box 18206 is shown in Figure 182 through which is user may create or delete a "relationship." But is this supposed to be the "displaying relationship information" limitation from Claim1? The rejection is based on Section 102. However, Fintel simply does not disclose each element of Claim 1.

In the Final Office Action mailed on May 1, 2002, more detail was provided in the rejection. It is asserted that "relationship information is met by the matrix showing the selected data with respect to locations of Headquarter Location, Sales Office and Customer Home of Figure 181" and goes on to say that "Figure 181 clearly shows the components of the object model and the selection of the components clearly causes relationship information to be retrieved and displayed in the matrix." This is shear conjecture at best. There is no written support in Fintel for this interpretation. A cited passage from Column 2, lines 15-44 identifies a need for a visual model for allows immediate visual interpretation of relationships. There is NO discussion of providing and displaying relationship information following the selection of an element.

Another cited passage from Column 7, lines 25-50 discusses a general overview of the four major activities of the SITA process. One of these activities includes identifying and defining relationships among objects. But this passage does not describe what is illustrated in Figures 175-201. This does not disclose retrieving and displaying relationship information following selection of an element.

The Final Office Action gets slightly more explicit, specifically citing Figures 178

and 182, and suggesting that Figure 178 shows "selection of data" and Figure 182 shows "editing properties". A conclusory sentence then states that "[c]learly, in order to edit relationships, all the claimed sub routines have to be present in the system taught by Fintel." Applicant begs to differ. To disclose the subject matter of Claim 1, all the subject matter must be disclosed. The subject passage from Claim 1 recites retrieving and displaying relationship information in response to a user selection of a component which is an element of the model. The matrix of Figure 182 is not an object model. It is a table. It is not created based on the selection of an element from an object model. The arguments provided in the Office Actions are heavy on conclusion but light on support from Fintel for these conclusions.

The Office Action's argument seems to boil down to be that the relationship matrix shows relationships and at the same time is the object model. There is no claim made in Fintel that the relationship matrix represents an object model, as recited by the second subprocess of Claim 1.

In summary, the present invention is directed to the understanding of relationships, and its claims recite the concept that relationship information is displayed and that relationships are selectable by a user. This concept is not taught, suggested or disclosed in the cited art. This is the problem with the prior art that is addressed by the present invention. The logical elements, such as the classes and methods, presented in the pane, are selectable in the prior art. However, in a complex object model, this is not enough information. Other relationships exist which cannot be presented in the hierarchical format of the cited prior art. As discussed on page 11 of the Application, "relationships are explicitly represented as elements of the model, as are the objects (components) in that model...object models which are not strictly hierarchical in structure can be conveniently and intuitively navigated, edited, and populated using the present invention...relational databases typically have many complex relationships, which are not necessarily hierarchical in structure." Further, "by explicitly displaying the complex relationships of the relational model, the present

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invention enables a user to better comprehend the underlaying model..." (page 12).

Accordingly, Applicants submit that independent Claim 1 patentably distinguishes over the cited art. Independent Claims 8 and 15 were rejected for the same reasons as Claim 1. Accordingly, it follows that these claims also patentably distinguish over the cited art, and it follows that the dependent claims also patentably distinguish over the cited art.

Accordingly, Applicant submits that Claims 1, 8 and 15 distinguish over the cited art, and respectfully request that the Board overturn these rejections.

2.   Dependent Claims 3, 10 and 17

Dependent Claim 3 recites "a subprocess for presenting an action list to said user." This claim is rejected under Section 103 over Fintel and "applicant's admitted prior art" (AAPA). In the AAPA, relationships may not be selected. And neither Fintel nor the AAPA teaches the use of an action list relative to relationships. The Office Action states that it would be obvious to present an action list "because the browser in the system of Fintel is an interactive tool for developing an object model." This is not a legitimate basis for an obviousness rejection. Applicant have nothing to argue against, except to say that the subject matter is not taught, suggested or disclosed in the cited art, and despite the conclusion reached by the Examiner, there is no support for that conclusion. Accordingly, Applicant submits that Claim 3, as well as dependent Claims 10 and 17, which include similar subject matter, patentably distinguish over the cited art.

3.   Dependent Claims 4, 11 and 18

Dependent Claim 4 recites that "said action list comprises a list of actions tailored to said selected one or more relationships." In the AAPA, relationships may not be selected. And the prior art does not teach the use of an action list relative to relationships. Each updated pane includes a list of elements that depend on what was displayed in the pane from which the user made his selection; there is no teaching that "each updated pane presents a different relationship information according to a user's selection", as alleged in the Office Action. There is certainly no cited teaching of an action list used in association with a selected relationship. Accordingly, Applicant submits that Claim 4, as well as dependent Claims 11 and 18, which include similar subject matter, patentably distinguish over the cited art.

4.   Dependent Claims 6, 13 and 20

Dependent Claim 6 recites that "said action list is filtered before being presented to said user, using one or more predefined filters." Once again, this subject matter is not taught or disclosed in the AAPA. The Office Action simply concludes that filtering an action list is well known based on official notice. No other argument or support is provided.

Of course, no art has been provided which teaches that an action list tailored to the selected relationships is obvious in the first place. How official notice can then be used to state that filtering of an action list for relationships in an object model is unsupported. Accordingly, Applicant submits that Claim 6, as well as dependent Claims 13 and 20, which include similar subject matter, patentably distinguish over the cited art.

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SUMMARY

Applicant respectfully submits that the final rejection of the claims under 35 U.S.C. Section 103 is improper and erroneous. Applicant respectfully urges the Board of Patent Appeals to reverse all grounds of the final rejection relative to the claims.

Respectfully submitted,   ,

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